

# **EXHIBIT 4**



via Email at [jessica.miller@skadden.com](mailto:jessica.miller@skadden.com)

December 26, 2022

Jessica Davidson Miller  
Skadden, Arps, Slate, Meagher & Flom LLP  
1440 New York Avenue  
N.W. Washington, D.C. 20005

**Re: In re Valsartan, Losartan, and Irbesartan Products Liability Litigation, Civil Action  
No. 19-md-2875**

Dear Attorney Miller:

We have received a subpoena in the above referenced case requesting production of documents on December 28, 2022. This letter serves as an objection under Federal Rules of Civil Procedure 26(b) and 45.

Specifically, we object to the definitions and instructions to the extent they are inconsistent with Valisure's obligations under the Federal Rules of Civil Procedure. We object to any request that requires the disclosure of privileged or otherwise protected information or communications. Valisure objects to the Subpoena to the extent it imposes undue costs on a third Party and reserves the right to seek compensation or reimbursement for any costs incurred.

Valisure also reserves the right to seek a Protective Order or Motion to Quash. Valisure is reviewing whether proper service of the Subpoena has been made and reserves the right to object to the Subpoena for improper service.

Subject to the foregoing objections, Valisure is aware that plaintiffs in the above referenced case are challenging this subpoena and at this time Valisure defers to the Court or other resolution of this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "David Light", written in a cursive style.

David Light, CEO  
Valisure LLC